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| 1 | HAYES WAKAYAMA JUAN |
|---|-----------------------------------|
| 2 | DALE A. HAYES, JR., ESQ. |
| | Nevada Bar No. 9056 |
| 3 | LIANE K. WAKAYAMA, ESQ. |
| | Nevada Bar No. 11313 |
| 4 | JACK C. JUAN, ESQ. |
| | Nevada Bar No. 6367 |
| 5 | 5798 5 S. Durango Drive, Ste. 105 |
| 6 | Las Vegas, Nevada 89113 |
| | (702) 656-0808 – Telephone |
| 7 | (702) 655-1047 – Facsimile |
| | dhayes@hwlawNV.com |
| 8 | lkw@hwlawNV.com |
| | <u>jcj@hwlawNV.com</u> |
| 9 | Attorneys for Plaintiffs |

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

DARLENE POST, individually and in her capacity as Special Administrator of the ESTATE OF **DAVID** POST; and **KIPALEE** PRINCE. individually and in her capacity as Special Administrator of the ESTATE OF DAVID PRINCE, Plaintiffs,

VS.

SOC, LLC, a foreign limited liability company; SOC, NEVADA, LLC, a foreign limited liability company; SOC Doe Guard, an individual; and DOES 1-5 and ROE ENTITIES 1-5,

Case Number: 2:25-cv-00062

[PROPOSED] STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFFS' TO OPPOSE **DEFENDANTS' MOTION TO** DISMISS PLAINTIFFS' **COMPLAINT**

(FIRST REQUEST)

Defendants.

Plaintiffs DARLENE POST, individually and in her capacity as Special Administrator of the ESTATE OF DAVID POST; and KIPALEE PRINCE, individually and in her capacity as Special Administrator of the ESTATE OF DAVID PRINCE (collectively "Plaintiffs"), by and through their attorneys of record, the law firm of HAYES WAKAYAMA JUAN; and Defendants SOC LLC and SOC Nevada LLC (jointly "SOC"), by and through their attorneys of record, the law firm of MAUPIN, COX, & LEGOY and DENTONS US LLP, hereby stipulate as follows:

1. On January 10, 2025, Defendants removed the instant matter from the Eighth Judicial District Court of Clark County, Nevada;

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| 2. | On January 17, 2025, Defendants filed their First Motion for Extension to respond |
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| to Plaintiffs' C | Complaint seeking a 91-day extension (ECF No. 11); |

- 3. On January 21, 2025, the Court granted that motion and extended Defendants' deadline until April 18, 2025 (ECF No. 13);
- On April 14, 2025, Defendants filed their Second Motion for Extension to respond 4. to Plaintiffs' Complaint, seeking an additional 14-day extension, which was not opposed by Plaintiffs (ECF No. 23);
- 5. On April 18, 2025, the Court granted that motion and extended Defendants' deadline until May 2, 2025 (ECF No. 24);
- 6. On May 2, 2025, Defendants filed their Motion to Leave to File Motion to Dismiss Plaintiffs' Complaint and Appendix of Exhibits Under Seal (ECF No. 28);
- 7. On May 2, 2025, Defendants filed under seal their Motion to Dismiss Plaintiffs' Complaint and Appendices 1 and 2 of Exhibits ("Motion to Dismiss");
- 8. Plaintiffs' Response to Defendants' Motion to Dismiss is currently due on May 16, 2025;
- 9. Due to the two recent voluminous filings with over 300 pages of exhibits, Plaintiffs' counsel has requested an extension of time to thoroughly review the recent filings and large number of exhibits and prepare their Response to the Motion to Dismiss;
- 10. Both parties have agreed that the deadline for Plaintiffs' Response shall be extended by <u>30</u> days to <u>June 16, 2025</u>.
- 11. There are no other deadlines that are affected by this stipulation and proposed order that are presently known to the parties;
- 12. This is the first stipulation concerning Plaintiffs' Response and is sought in good faith and is not made for the purpose of delay; and

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| 13. | Therefore, the Parties here | eby stipulate and agree that Plaintiffs shall have up | | | |
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| through and including June 16, 2025 to file their Response to Defendants' Motion to Dismiss. | | | | | |
| IT IS | SO STIPULATED. | | | | |
| Dated this 9 th | day of May, 2025. | Dated this 9 th day of May, 2025. | | | |

HAYES | WAKAYAMA

By:/s/ Dale A. Hayes, Jr., Esq. DALE A. HAYES, JR., ESQ. Nevada Bar No. 9056 LIANE K. WAKAYAMA, ESQ. Nevada Bar No. 11313 JACK C. JUAN, ESQ. Nevada Bar No. 6367 4735 S. Durango Drive, Suite 105 Las Vegas, Nevada 89147 Attorneys for Plaintiff

MAUPIN, COX, & LEGOY

By:/s/ Gale Monahan, Esq.

PAUL J. ANDERSON, ESQ. 4785 Caughlin Parkway P.O. Box 30,000 Reno, NV 89519/89520 (P.O. Box)

STEVEN MASIELLO, ESQ. (pro hac vice application forthcoming) SEAN D. G. CAMACHO, ESQ. (pro hac vice application forthcoming) DENTONS US LLP 1400 Wewatta Street, Suite 700 Denver, CO 80202

GALE MONAHAN, ESQ. (pro hac vice application forthcoming) DÉNTONS US LLP 100 Crescent Ct. #900 Dallas, TX 75201 Attorney for Defendants SOC LLC and SOC Nevada LLC

May 9, 2025

ORDER

IT IS SO ORDERED.

Gloria M. Navarro

United States District Judge

DATED: May , 2025.